



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

FJN/APW
F. #2021R00043

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 11, 2021

By Hand Delivery and ECF

Mia Eisner-Grynberg, Esq.
Federal Defenders of New York, Inc.
One Pierrepont Plaza - 16th Floor
Brooklyn, NY 11201

Re: United States v. Eduard Florea
Criminal Docket No. 21-037 (EK)

Dear Ms. Eisner-Grynberg:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. These materials are being produced pursuant to the Protective Order entered by the Court on May 10, 2021.

The government hereby provides the following documents, photographs, electronic data, and other information, some of which records may contain statements of the defendant:

Bates Numbers	Description
EF000192-EF000192	Electronic copy of three hard drives from a Corsair computer bearing a serial number ending in 9709, which was seized from the defendant's residence on January 13, 2021 (SENSITIVE).
EF000193-EF000193	Electronic copy of five Micro SD cards seized from the defendant's residence on January 13, 2021 (SENSITIVE).
EF000194-EF000194	Electronic copy of 6 flash drives seized from the defendant's residence on January 13, 2021 (SENSITIVE).
EF000195-EF000195	Electronic copy of an Acer computer bearing a serial number ending in 2701, which was seized from the defendant's residence on January 13, 2021 (SENSITIVE).

Bates Numbers	Description
EF000196-EF000196	Electronic copy of an external hard drive from an Asus desktop computer bearing a serial number ending in 9709, which was seized from the defendant's residence on January 13, 2021 (SENSITIVE).
EF000197-Ef000197	Electronic copy of a Dell Vostro tower computer bearing a serial number ending in GBP1, which was seized from the defendant's residence on January 13, 2021 (SENSITIVE).
EF000198-EF000198	Electronic copy of four hard drives seized from the defendant's residence on January 13, 2021 (SENSITIVE).
EF000199-EF000199	Electronic copy of a Galaxy Note bearing an IMEI ending in 1448, which was seized from the defendant on January 13, 2021 (SENSITIVE).
EF000200-EF000200	Electronic copy of a Galaxy Note bearing an IMEI ending in 6098, which was seized from Joni Florea on January 13, 2021 (SENSITIVE).
EF000201-EF000201	Electronic copy of a Galaxy Note bearing an IMEI ending in 4013, which was seized from the defendant's residence on January 13, 2021 (SENSITIVE).
EF000202-EF000202	Electronic copy of a Galaxy Note bearing an IMEI ending in 7248, which was seized from the defendant's residence on January 13, 2021 (SENSITIVE).
EF000203-EF000203	Electronic copy of a Hitachi hard drive bearing a serial number ending in 35NB, which was seized from the defendant's residence on January 13, 2021 (SENSITIVE).
EF000204-EF000204	Electronic copy of a HP Stream laptop computer bearing a serial number ending in 4XMT, which was seized from the defendant's residence on January 13, 2021 (SENSITIVE).
EF000205-EF000205	Electronic copy of an iPhone 6 bearing an IMEI ending in 2088, which was seized from the defendant's residence on January 13, 2021 (SENSITIVE)
EF000206-EF000206	Electronic copy of a Macbook Pro bearing a serial number ending in LVDQ, which was seized from the defendant's residence on January 13, 2021 (SENSITIVE)

Bates Numbers	Description
EF000207-EF000207	Electronic copy of a Motorola Nexus telephone bearing an IMEI ending in 1934, which was seized from the defendant's residence on January 13, 2021 (SENSITIVE).
EF000208-EF000208	Electronic copy of a Western Digital hard drive bearing a serial number ending in 2407, which seized from the defendant's residence on January 13, 2021 (SENSITIVE).
EF000176-EF000191	Photographs of ammunition seized from the defendant's residence
EF000209-EF000216	Records obtained from eBay, Inc. (SENSITIVE)
EF000217-EF000219	Stormfront Screenshots
EF000220-EF0002361	Records obtained from Facebook, Inc. (SENSITIVE)
EF002362-EF002374	Records obtained from Google, LLC (SENSITIVE)
EF002375-EF002376	Records obtained from The Home Depot, Inc.
EF002377-EF002545	Records obtained from Oath Holdings, Inc. (SENSITIVE)
EF0002546-EF0002570	Records obtained from PayPal, Inc. (SENSITIVE)
EF002571-EF002574	Pen register trap and trace information obtained from T-Mobile, Inc. regarding the defendant's telephone ending in 7415.
EF002575-EF003501	Records obtained from TD Bank, Inc. (SENSITIVE)
EF003502-EF003512	Records obtained from T-Mobile, Inc.
EF003513-EF003513	Records obtained from Amazon, Inc.
EF003574-EF003574	Records obtained from Stripe
EF003575-EF003590	Records obtained from TransUnion
EF003591-EF003632	Records obtained from JPMorgan Chase Bank
EF003633-EF003651	Records obtained from Experian
EF003652-EF002652	Log of items collected from the defendant's residence on January 15, 2021

Bates Numbers	Description
EF003653-EF003705	Agent Affidavit in Support of Application for Search Warrants for Stored Electronic Communications

In addition, during the course of its investigation, the government has obtained certain physical evidence. You may examine the physical evidence discoverable under Rule 16, including any original documents, by calling me to arrange a mutually convenient time.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Please be advised that, pursuant to the policy of the Office concerning plea offers and negotiations, no plea offer is effective unless and until made in writing and signed by authorized representatives of the Office. In particular, any discussion regarding the pretrial disposition of a matter that is not reduced to writing and signed by authorized representatives of the Office cannot and does not constitute a “formal offer” or a “plea offer,” as those terms are used in Lafler v. Cooper, 132 S. Ct. 1376 (2012), and Missouri v. Frye, 132 S. Ct. 1399 (2012).

Very truly yours,

MARK J. LESKO
Acting United States Attorney

By: /s/ Francisco J. Navarro
Francisco J. Navarro
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Enclosures

cc: Clerk of the Court (EK) (by ECF) (without enclosures)